



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

### TIDEWATER REGIONAL OFFICE

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### STATEMENT OF LEGAL AND FACTUAL BASIS

Ball Metal Beverage Container Corp.  
Williamsburg, Virginia  
Permit No. TRO-60065

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Ball Metal Beverage Container Corp. has applied for a Title V Operating Permit for its Williamsburg, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:

Lindsey M. Evans

Lindsey M. Evans  
(757) 518-2168

Date:

11-18-10

Air Permit Manager:

Jane A. Workman

Date:

11/22/10

Regional Director:

Francis L. Daniel

Date:

11-22-10

## I. FACILITY INFORMATION

### Permittee

Ball Metal Beverage Container Corporation  
9300 W. 108th Circle  
Broomfield, Colorado 80021-3682

### Facility

Ball Metal Beverage Container Corporation  
James River Commerce Center  
8935 Pocahontas Trail  
Williamsburg, Virginia 23185

County-Plant Identification Number: 51-095-00008

### Source Description

**Facility Description:** NAICS 332431/SIC 3411 - Metal Can Manufacturing

This facility manufactures aluminum beverage cans (not final product).

### **Process Description:**

Ball Metal Beverage Container Corporation operates four can lines designated as Line 2, Line 3, Line 4, and Line 5. The can line emission points include the internal coating process, the decorator process, and the basecoater process.

Can Manufacturing Process: The can manufacturing process begins by feeding a continuous aluminum sheet into a cupping press. The cupper forms the aluminum into short cups that are extruded into formed cans in the bodymakers. Cans are conveyed to a can washer to remove any lubricant used in the cupping and bodymaker processes and then to a drying oven. A small amount of sulfuric acid emissions are emitted from the washers; however, these emissions are considered insignificant. Hot water boilers are used to heat the water used to wash the cans. No emissions of criteria or hazardous air pollutants are associated with these processes other than the natural gas combustion emissions from the washer ovens and hot water boilers. Note: The plant's ovens use natural gas as the main fuel source; however, the plant operates an on-site propane fuel system in emergency situations.

From the can washers, cans are fed to the basecoater where the can exterior is coated with basecoat. The exterior coating is then cured in the basecoater ovens. Air emissions from the basecoater process are exhausted through the basecoater oven stacks.

Note: A bottom coater using ultraviolet (UV) cured coating and an associated UV light curing tunnel is proposed for Line 2. An exemption letter was issued for this process on August 31, 2005. When installed, this process will occur after the washer oven and prior to the basecoater or decorator process.

From the basecoater ovens, cans are fed to printers, where thermally cured inks and water-based overvarnish are applied to the cans. Bottom coating is then applied to the cans prior to entering the decorator oven. Air emissions from the decorator process are exhausted through the decorator oven stacks.

After the decorated cans are cured, the cans are conveyed to the internal coating process where a thin layer of water-based, thermally cured coating is applied to the inside of the cans. Overspray emissions from this process are exhausted through a

dedicated overspray stack. The cans also receive a small ink identification dot on the outside bottom of the cans while in the spray machine pocket for quality assurance purposes. The coated cans are then cured in natural gas-fired curing ovens. Criteria and hazardous air pollutants from the internal coating process are exhausted out of the overspray and curing oven stacks.

Cans exiting the internal coating ovens are conveyed to a waxer that applies a thin coat of lubricant to the outside top edge of the can in preparation for necking. This lubricant does not contain VOCs. The necker then reduces the diameter of the can opening while the necker and flanger roll back the top edge of the can to form a lip for attaching the can end or lid. The reprofiler makes final adjustments to the bottom of the can. Finished cans are palletized for shipment or storage. There are no air emissions associated with the waxing, necking, reprofiling, or palletizing processes.

Re-spray Process: The facility occasionally manufactures cans which have inside metal exposure, meaning the cans received an insufficient amount of internal coating. The defective cans are palletized and stored until they can be reprocessed at a later date. The facility performs re-spray operations on the defective cans using a reduced amount of internal coating. The re-sprayed cans are cured in the re-spray curing oven. The emissions from internal coating re-spray are accounted for in the material usage/emission reports.

The facility is a Title V major source of Volatile Organic Compounds. This source is located in an attainment area for all pollutants, and is a PSD-sized major source. The facility was previously permitted under a Minor NSR Permit issued on May 19, 1989, and last amended on August 17, 2010.

The source is subject to the New Source Performance Standards for the Beverage Can Surface Coating Industry (40 CFR 60, Subpart WW). These standards apply to the exterior basecoating operation, the overvarnish coating operation, and the inside spray coating operation. The source is also subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ). These standards apply to the natural gas-fueled emergency generator.

## II. COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

### III. EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

<i>Emission Unit ID</i>	<i>Stack ID</i>	<i>Emission Unit Description</i>	<i>Size/Rated Capacity</i>	<i>Pollution Control Device Description (PCD)</i>	<i>PCD ID</i>	<i>Pollutant Controlled</i>	<i>Applicable Permit Date</i>
<b>Fuel Burning Equipment</b>							
B1		Cleaver Brooks Boiler L54106, installed in 1972	12.553 million Btu/hr				
		Cleaver Brooks Boiler L54107, installed in 1972	12.553 million Btu/hr				
EG		Generac Natural Gas Emergency Generator, installed in 1985	15 kW (20 hp)				
<b>Internal Coating and Internal Coating Oven</b>							
01	S010, S011, S020, S021, S022, S023, S024, S027, S028, S029, S030	Lines 2-5 Internal Coating Operations (including respray line)	84.2 gallons coating/hr				8/17/2010
01		Line 2 Internal Coating Oven	6.0 million Btu/hr				
01		Line 3 Internal Coating Oven	4.5 million Btu/hr				
01		Line 4/5 Combined Internal Coating Oven	10.0 million Btu/hr				
01/02		Internal Coating Respray Oven	2.4 million Btu/hr				

<i>Emission Unit ID</i>	<i>Stack ID</i>	<i>Emission Unit Description</i>	<i>Size/Rated Capacity</i>	<i>Pollution Control Device Description (PCD)</i>	<i>PCD ID</i>	<i>Pollutant Controlled</i>	<i>Applicable Permit Date</i>
Decorator and Decorator Oven							
02	S06, S019, S035, S036, S037, S038	Lines 2-5 Overvarnish Rim Coating Operations	32.8 gallons coating/hr				8/17/2010
02		Line 2 Decorator and Oven	5.0 million Btu/hr				
02		Line 3 Decorator and Oven	5.0 million Btu/hr				
02		Line 4 Decorator and Oven	7.0 million Btu/hr				
02		Line 5 Decorator and Oven	7.0 million Btu/hr				
02		UV Bottom Coater and Associated UV Light Curing Tunnel	0.15 gallons coating/hr				8/31/2005 (exemption)
Basecoater and Basecoater Oven							
03	S016, S017, S033, S034	Lines 2 and 4 Basecoating Operations	20.7 gallons coating/hr				8/17/2010
03		Line 2 Basecoat Oven	5.0 million Btu/hr				
03		Line 4 Basecoat Oven	7.0 million Btu/hr				
General Plant and Parts Cleaning Operations							
04		Parts cleaning machines (small dip tanks), general wipe cleaning, and video jet.	4,050 gallons/yr				
Washer Ovens							
W02		Line 2 Washer Oven	3.5 million Btu/hr				

<i>Emission Unit ID</i>	<i>Stack ID</i>	<i>Emission Unit Description</i>	<i>Size/Rated Capacity</i>	<i>Pollution Control Device Description (PCD)</i>	<i>PCD ID</i>	<i>Pollutant Controlled</i>	<i>Applicable Permit Date</i>
W03		Line 3 Washer Oven	3.5 million Btu/hr				
W04/5		Line 4/5 Combined Washer Oven	2.7 million Btu/hr				11/20/2007 (exemption)
<b>Can Marking Identification System</b>							
05		Can Marking System	0.08 gallons/million cans (0.03 gallons coating/hr)				8/17/2010

#### IV. EMISSIONS INVENTORY

A copy of the 2009 annual emission update is attached. Emissions are summarized in the following table.

2009 Actual Emissions

Emission Unit	2009 Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	NO <sub>x</sub>
Total	342.1	7.0	0.07	1.9	8.6

## **V. EMISSION UNIT APPLICABLE REQUIREMENTS - Fuel Burning Equipment Requirements (Emission Unit ID No. B1 and Line 4/5 Combined Internal Coating Oven)**

### **A. Limitations**

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

9 VAC 5-50-20	Compliance for New and Modified Sources
9 VAC 5-50-80	Standard for Visible Emissions for New and Modified Sources
9 VAC 5-50-90	Standard for Fugitive Dust/Emissions for New and Modified Sources
9 VAC 5-40-900	Standard for Particulate Matter for Existing Sources
9 VAC 5-40-930	Standard for Sulfur Dioxide for Existing Sources

### **B. Monitoring**

The permit does not include a periodic monitoring requirement for opacity from the boilers or the Line 4/5 combined internal coating oven. These units are fueled by natural gas with propane backup. No visible emissions are expected from combusting these fuel types.

Note: The previous Title V permit included particulate matter and sulfur dioxide emission standards for the boilers only. During processing of this Title V renewal permit, the rated capacities of many of the ovens were corrected. The Line 4/5 combined internal coating oven was previously listed as having a rating of 9.0 MMBtu/hr; however, it is now correctly listed as having a rating of 10.0 MMBtu/hr. The unit is, therefore, subject to the requirements of 9 VAC 5-40-880 et seq. (Rule 4-8, Emission Standards for Fuel Burning Equipment). The PM emission standards in Condition III.A.2 and the SO<sub>2</sub> emission standard in Condition III.A.3 have been re-calculated to account for this additional unit. Condition III.A.1 and III.B.1.a have also been revised to include the Line 4/5 combined internal coating oven. No requirements have been included for the remaining ovens, since these units are rated below the 10 MMBtu/hr size cut-off for gas-fired units under Rule 4-8.

The permit does not include periodic monitoring requirements for the particulate matter standard and the sulfur dioxide standard. Based on calculations using AP 42 emission factors and the capacity of the equipment, the likelihood of exceeding the standards is low. Supporting calculations are found below.

AP 42, Table 1.4-2 emission factor for natural gas combustion for PM (total) = 7.6 lb/mmft<sup>3</sup>

AP 42, Table 1.4-2 emission factor for natural gas combustion for SO<sub>2</sub> = 0.6 lb/mmft<sup>3</sup>

Each boiler is rated at 12.553 million Btu/hr

The Line 4/5 combined internal coating oven is rated at 10.0

Heating value for natural gas = 1,050 Btu/ft<sup>3</sup>

PM emissions for the boilers using AP 42 emission factors are as follows:

$(12.553 \text{ million Btu/hr}) / (1,050 \text{ Btu/ft}^3) = 11,955 \text{ ft}^3/\text{hr}$  burned maximum

$(11,955 \text{ ft}^3/\text{hr}) \times (7.6 \text{ lb/mmft}^3) = 0.09 \text{ lbs/hr PM per boiler}$

Title V permit limitation = 5.9 lbs/hr per boiler



PM emissions for the Line 4/5 combined internal coating oven using AP 42 emission factors are as follows:

$(10.0 \text{ million Btu/hr}) / (1,050 \text{ Btu/ft}^3) = 9,524 \text{ ft}^3/\text{hr}$  burned maximum

$(9,524 \text{ ft}^3/\text{hr}) \times (7.6 \text{ lb/mmft}^3) = 0.07 \text{ lbs/hr PM}$  for the Line 4/5 combined internal coating oven

Title V permit limitation = 4.3 lbs/hr

SO<sub>2</sub> emissions using AP 42 emission factors are as follows:

$(11,955 \text{ ft}^3/\text{hr}) \times (0.6 \text{ lb/mmft}^3) = 0.007 \text{ lbs/hr per boiler}$

$(0.007 \text{ lbs/hr per boiler}) \times (2 \text{ boilers}) = 0.014 \text{ lbs/hr}$

$(9,524 \text{ ft}^3/\text{hr}) \times (0.6 \text{ lb/mmft}^3) = 0.006 \text{ lbs/hr}$

$(0.014 \text{ lbs/hr}) + (0.006 \text{ lbs/hr}) = 0.02 \text{ lbs/hr SO}_2$  for the installation

Title V permit limitation = 92.7 lbs/hr for the installation

### **C. Recordkeeping**

The permittee is required to maintain records of the type of fuel combusted in the boilers and the Line 4/5 combined internal coating oven as well as the emission factors and equations used for actual emissions calculations to ensure compliance with the particulate matter and sulfur dioxide standards.

### **D. Streamlined Requirements**

There are no streamlined requirements for these emission units.

## **VI. EMISSION UNIT APPLICABLE REQUIREMENTS - Natural Gas Emergency Generator Requirements (Emission Unit ID No. EG)**

### **A. Limitations**

The following Code of Federal Regulations has been determined to be applicable:

40 CFR 63 Subpart ZZZZ      National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The following Virginia Administrative Code has been determined to be applicable and is incorporated into the specific conditions in this section of the permit:

9 VAC 5-60-100      Designated Emission Standards (National Emission Standards for Hazardous Air Pollutants for Source Categories)

Note: The natural gas emergency generator was also evaluated for applicability to 40 CFR 60 Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines); however, the unit was installed in 1985, which was prior to the June 12, 2006 applicability date for owners and operators of stationary SI ICE.

### **B. Monitoring**

The permit does not include a periodic monitoring requirement for opacity from the emergency generator. The generator is small (15 kW) and is used only for emergency purposes and for no more than 500 hours per year. Furthermore, the generator is fueled by natural gas with propane backup. No visible emissions are expected from combusting these fuel types.

### **C. Recordkeeping**

The permittee is required to maintain records of the hours of operation of the natural gas emergency generator to demonstrate its continued status as "emergency" under Virginia regulations. The permittee is also required to comply with the applicable recordkeeping requirements in 40 CFR 63 Subpart ZZZZ.

### **D. Streamlined Requirements**

There are no streamlined requirements for this emission unit.

## **VII. EMISSION UNIT APPLICABLE REQUIREMENTS - Process Equipment Requirements (Emission Unit ID Nos. 01-03, 05, W02, W03, W04/5)**

### **A. Limitations**

The following limitations are derived from the New Source Review permit issued August 17, 2010:

- NSR Condition 3: VOC work practice standard
- NSR Condition 4: VOC emission limitations
- NSR Condition 5: NSPS emission limitation
- NSR Condition 6: NSPS emission limitation
- NSR Condition 7: NSPS emission limitation
- NSR Condition 8: NSPS requirements by reference

Note: The emission limits in Condition V.A.2 (referencing NSR Condition 4) apply only to the VOC emissions from the internal coating, overvarnish, and basecoating operations, not to the facility-wide VOC emissions. The condition has been revised to clarify this.

The following Code of Federal Regulations has been determined to be applicable:

40 CFR Part 60 Subpart WW Standards of Performance for the Beverage Can Surface Coating Industry

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

- 9 VAC 5-50-80 Standard for Visible Emissions for New and Modified Sources
- 9 VAC 5-40-260 Standard for Particulate Matter for Existing Sources

### **B. Continuing Compliance Determinations**

The following limitations are derived from the New Source Review permit issued August 17, 2010:

- NSR Condition 9: NSPS performance evaluations

### **C. Monitoring and Recordkeeping**

The permit does not include a periodic monitoring requirement for opacity from these units. No visible emissions are expected from these operations. In addition, 40 CFR Part 60 Subpart WW does not specify an opacity requirement for the coating operations.

The source is subject to the process weight standard in 9 VAC 5-40-260; however, the permit does not include periodic monitoring or recordkeeping requirements to demonstrate ongoing compliance with this standard. Based on emissions calculations using source data, the likelihood of exceeding the standards is low. Supporting calculations are found below.

<b>Compliance Determination for Particulates</b>			
<b>Process Weight Rate Rule</b>			
Material	Usage Lbs/Yr.	Usage Hrs/Yr.	Usage Lbs./Hr.
Aluminum	83,714,968	8,760	9,557
Inside Coating	3,774,305	8,760	431
Total	87,489,273	8,760	9,987
Allowable Emission Rate from Table (9 VAC 5-40-260) =			11.2 Lbs./Hr.
Internal Coating % Solids	Lbs Solids Sprayed / Hr.	% Solids Emitted	Lbs Solids Emitted / Hr.
21.10%	90.9	0.322%	0.3
This demonstrates compliance with permit conditions as particulate emission rates cannot be exceeded even with the absence of controls. Oil mist emissions are de minimis and therefore also comply with the above.			
Estimated emissions based on 2009 consumption data			
0.322% emission rate of all solids sprayed is based on source test			

The permittee is required to maintain an operating log of coating, ink, and clean-up solvent consumption and records of VOC emissions calculations to ensure compliance with the emission limitations. The permittee is also required to maintain records of all data and calculations used in the monthly performance tests, in accordance with 40 CFR 495(d).

#### **D. Streamlined Requirements**

There are no streamlined requirements for these emission units.

## **VIII. EMISSION UNIT APPLICABLE REQUIREMENTS - Parts Cleaning Requirements (Emission Unit ID No. 04)**

### **A. Limitations**

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

9 VAC 5-40-3280	Standard for Volatile Organic Compounds
9 VAC 5-40-3290	Control Technology Guidelines

### **B. Monitoring**

The permittee is required to perform annual visual inspections to ensure compliance with the labeling, cover, and closed container requirements outlined in 9 VAC 5-40-3280 and 9 VAC 5-40-3290. This section has been restructured into one condition (instead of two) for clarity.

### **C. Recordkeeping**

The permittee is required to maintain records of annual inspection results, any corrective actions taken, and the methods of waste solvent disposal.

### **D. Streamlined Requirements**

There are no streamlined requirements for these emission units.

## **IX. EMISSION UNIT APPLICABLE REQUIREMENTS - Facility Wide Requirements**

### **A. Limitations**

The plant-wide HAP emission limit condition has been moved to this section (Condition VII.A.1). This condition serves to limit the facility to synthetic minor status for HAP emissions.

### **B. Recordkeeping**

The recordkeeping requirements associated with the plant-wide HAP emission limit condition has also been moved to this section (Condition VII.B.1.a).

### **C. Testing**

The permit requires construction of the facility in such a manner so as to allow for emissions testing at any time using appropriate methods.

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

## **X. GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

### **B. Permit Expiration**

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 3-2006".

### **F. Failure/Malfunction Reporting**

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

### **J. Permit Modification**

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources

9 VAC 5-80-190. Changes to Permits

9 VAC 5-80-260. Enforcement

9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources

9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

### **U. Malfunction as an Affirmative Defense**

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

### **Y. Asbestos Requirements**

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

## XI. INAPPLICABLE REQUIREMENTS

Citation	Title of Citation	Description of Applicability
40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	This requirement does not apply to Emission Unit B1 (Cleaver Brooks Boilers); these units were installed prior to June 9, 1989.
40 CFR 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	This requirement does not apply to any of the tanks listed as insignificant. The tanks are either smaller in size than 75 m <sup>3</sup> (20,000 gallons) or were installed prior to the applicability date of July 23, 1984.
40 CFR 63 Subpart KKKK	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans	This requirement does not apply to this beverage can coating facility. This facility emits HAPs in amounts below 10 tpy of a single HAP and 25 tpy of combined HAPs. A federally enforceable condition regarding this limit is included in this permit.
40 CFR 63 Subpart DDDDD	National Emission Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters	The source has fulfilled the initial notification requirement. With the inclusion in this permit of a requirement to limit HAPs to synthetic minor status, no other compliance requirements will apply.



## XII. INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (5-80-720.B)	Rated Capacity (5-80-720.C)
OV Tank	Overvarnish Coating Tank	9 VAC 5-80-720 B	VOC	12,000 gallons
IC Tank	Internal Coating Tank	9 VAC 5-80-720 B	VOC	12,000 gallons
BC Tank	Basecoat Tank	9 VAC 5-80-720 B	VOC	12,000 gallons
GO	Grieve Oven for Drying Internal Coating Paste	9 VAC 5-80-720 B	VOC	N/A
WTS	Wastewater Treatment System	9 VAC 5-80-720 B	VOC	N/A
UO Tank	Used Oil Tank	9 VAC 5-80-720 B	VOC	10,000 gallons
BO1	Bulk Oil Tank #1	9 VAC 5-80-720 B	VOC	10,000 gallons
BO2	Bulk Oil Tank #2	9 VAC 5-80-720 B	VOC	10,000 gallons
P1	Propane Tank	9 VAC 5-80-720 B	VOC	30,000 gallons
P2	Propane Tank	9 VAC 5-80-720 B	VOC	30,000 gallons
TT	Trabon Lube Tank	9 VAC 5-80-720 B	VOC	2,000 gallons
MC1	Mist Collector for Lines 4 & 5	9 VAC 5-80-720 B	VOC and PM	15,750 ACFM
MC2	Mist Collector for Lines 2 & 3	9 VAC 5-80-720 B	VOC and PM	15,750 ACFM
Fork	Propane Powered Fork / Lift Trucks and Equipment	9 VAC 5-80-720 A	N/A	N/A
Heat	Natural Gas Comfort Space Heating Units	9 VAC 5-80-720 A	N/A	N/A
Water	Natural Gas Hot Water Heaters	9 VAC 5-80-720 B	SO <sub>2</sub> , NO <sub>x</sub> , CO, PM, VOC	N/A
06	Can Washers	9 VAC 5-80-720 B	Sulfuric Acid Mist	0.470 million cans/hr

<sup>1</sup>The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

### **XIII. CONFIDENTIAL INFORMATION**

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

### **XIV. PUBLIC PARTICIPATION**

The proposed permit will be placed on public notice in The Daily Press from October 7, 2010 to November 8, 2010.

Registration Number: 60065

County - Plant ID: 095-00008

Plant Name: Ball Metal Beverage Container Corporation

**POLLUTANT EMISSIONS REPORT (PLANT) (Tons/Year)**Parameter List

Pollutant Type: All Pollutants

Years: 2009-2009

	CO	NO2	PM	PM 10	SO2	VOC
2009	7.024	8.553	1.280	1.929	0.067	342.117